REMARKS / DISCUSSION OF ISSUES

Claims 19, 21-34, 36-37, and 40-44 are pending in the application. Claims 20, 35, and 38-39 are canceled herein.

The applicants thank the Examiner for acknowledging the claim for priority and receipt of certified copies of all the priority document(s), and for determining that the drawings are acceptable.

The Office action rejects claims 19, 21-32, 36-37, 40-41, and 44 under 35 U.S.C. 101. Independent claims 19 and 26 are amended to associate the claimed method to a statutory device, and claim 36 is amended to define the structural and functional interrelationship between the claimed medium and a receiving system to permit the claimed structure and function to be realized. The applicants respectfully request the Examiner's reconsideration of the rejection of claims 19, 21-32, 36-37, 40-41, and 44 under 35 U.S.C. 101.

The Office action rejects claims 19, 21-24, 26-31, 33-34, and 36-44 under 35 U.S.C. 103(a) over Sellers et al. (USP 5,475,400, hereinafter Sellers) and Banker et al. (USP 5,579,057, hereinafter Banker). The applicants respectfully traverse this rejection.

The combination of Sellers and Bankers fails to disclose encoding a graphic image with n-bit pixels that includes encoding a compatibility code indicating a required minimum number of entries of a color-look-up-table having fewer than 2^n entries, as claimed in independent claims 19, 33, and 36, and fails to teach disabling display of the graphic image when the color-look-up-table at a receiver has fewer than the required minimum number of entries, as claimed in independent claims 26 and 34.

The Office action asserts that Sellers teaches encoding a compatibility code indicating a required minimum number of entries of a color-look-up-table at column 4, lines 34-67 (Office action, page 6, fourth paragraph). The Office action also asserts that the cited text of Sellers teaches that the compatibility code is used to disable display of the graphic image (Office action, page 12, second and third full paragraphs). The applicants respectfully disagree with these assertions.

Sellers teaches a technique for efficiently processing a DIB (Device Independent Bitmap) file via the use of a translation table 252 that is configured to provide a mapping between the pixel values in the DIB file and the entries in a color lookup table 216. Sellers assumes that the size of the color lookup table 216 is known when this translation table is created:

> "The length of each entry in the first translation table conforms to the number of color bit planes in frame buffer. For example if the frame buffer accommodates twenty four bits for a true color display, each entry in the first translation table would have twenty four bits. The second color translation table operates on the color bits which are read from the frame buffer." (Sellers, column 3, lines 8-15.)

In Sellers, the number of bits in the frame buffer corresponds to the number of entry bits in the second color translation table. Sellers does not address how to create the first translation table if the number of bits in the frame buffer is unknown when the DIB is created, and Sellers does not address the possibility that the number of bits in the frame buffer on the receiving system differs from the number of bits used in the first translation table.

Sellers does not specify a minimum number of entries in the color lookup table, because Sellers assumes that the number of entries in the color lookup table is a known value that is used when the first translation table is created.

At the text that is cited in the Office action, Sellers addresses the number of entries in the first translation table based on whether the DIB file uses 1, 4, 8, or 24 bits for pixel color encoding. In each of these encoding formats, the number of bits that are output from the translation table is equal to the known number of entry bits (24) in the color lookup table 216. Sellers does not address the number of entry bits in the color lookup table 216, other than to reference it as a known value.

Sellers does not teach encoding an indication of a minimum number of entries in the color lookup table in the DIB file, because the number of entries in the color lookup table at the receiving system is assumed to be known.

Because the number of entries in the color lookup table is known, Sellers also does not teach disabling the display of the encoded image based on the number of entries in the color lookup table at the receiving system.

At the cited text, Sellers addresses limiting the number of entries in the translation table, and teaches that the translation table is bypassed if the DIB encoding exceeds this limit. Sellers teaches setting the "DIB bit" 251 to "0" if the DIB encoding exceeds the limit, and teaches that this bit controls whether the pixel data is sent directly to the frame buffer, or to the translation table 252 (Sellers, column 4, lines 11-13). In either case, the image data is displayed, and in either case, this limit is not related to the number of entries in the color lookup table 216.

Because Sellers fails to teach a required minimum number of entries of a color-look-up-table and fails to teach disabling the display of the graphic image when the color-look-up-table at a receiver has fewer than the required minimum number of entries, as relied upon in this rejection by the Office action, the applicants respectfully request the Examiner's reconsideration of the rejection of claims 19, 21-24, 26-31, 33-34, and 36-44 under 35 U.S.C. 103(a) over Sellers and Banker.

The Office action rejects claims 25 and 32 under 35 U.S.C. 103(a) over Sellers, Banker, and Maturi et al. (USP 5,559,999, hereinafter Maturi). The applicants respectfully traverse this rejection.

Claims 25 and 32 are dependent upon claims 19 and 26, and in this rejection, the Office action relies on the combination of Sellers and Banker for teaching the elements of claims 19 and 26. As noted above, the combination of Sellers and Banker fails to teach the elements of claims 19 and 26. Accordingly, the applicants respectfully request the Examiner's reconsideration of the rejection of claims 25 and 32 under 35 U.S.C. 103(a) over Sellers, Banker, and Maturi.

In view of the foregoing, the applicants respectfully request that the Examiner withdraw the objection(s) and/or rejection(s) of record, allow all the pending claims, and find the application in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

/Robert M. McDermott/
Robert M. McDermott, Esq.
Reg. 41,508
804-493-0707

Please direct all correspondence to:
Corporate Counsel
U.S. PHILIPS CORPORATION
P.O. Box 3001
Briarcliff Manor, NY 10510-8001